

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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ZHONGSHAN TANDEM PLASTIC PRODUCTS
CO., LTD.,

Civ. No. 21-cv-02321-JPO

Plaintiff,

**STIPULATION AND
PROPOSED ORDER**

-against-

STRAIGHTLINE CAPITAL, LLC, DAVID AULT,
CKR LAW, LLP, and JEFFREY A. RINDE,

Defendants.
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WHEREAS, Defendants CKR Law LLP ("CKR") and Jeffrey A. Rinde ("Rinde," collectively with CKR the "CKR Defendants") have moved this Court for an Order to Stay and Compel Arbitration by Notice of Motion and supporting papers filed September 2, 2021 (the "Motion"); and

WHEREAS Plaintiff Zhongshan Tandem Plastic Products Co., Ltd. ("Plaintiff" or "Zhongshan") and the CKR Defendants have discussed in good faith a means of resolving the Motion between themselves; and

WHEREAS Plaintiff and the CKR Defendants have agreed to submit all claims to arbitration (the "Arbitration") before JAMS under the JAMS Comprehensive Arbitration Rules & Procedures in accordance with a confidential stipulation signed by each of the parties (the "Stipulation"); and

IT IS HEREBY STIPULATED AND AGREED, by and between counsel for Plaintiff and the CKR Defendants, that the Motion is resolved in the manner specified below, subject to this Court's approval and order:

- **ORDERED**, that the Motion is removed from the calendar without prejudice. If no further action is taken by any party hereto, under the terms of

this Stipulation, the Motion shall as of January 4, 2022 be deemed “terminated” and the clerk shall docket this matter accordingly.


- **ORDERED,** that this action as to Defendants Rinde and CKR is stayed until fifteen (15) days after the issuance of a final award in the Arbitration.
- **ORDERED,** that within fifteen (15) days after the issuance of a final award in the Arbitration, the parties shall submit a status report of no more than two pages.

STIPULATED AND AGREED: December 23, 2021

SilvermanAcampora LLP
*Attorneys for Plaintiff Zhongshan
Tandem Plastic Products Co., Ltd.*

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